

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

**Return Date: September 8, 2015  
@ 11:00 a.m.**

**In re:**

**Ladder 3 Corp,**

**Debtor.**

**CHAPTER 7**

**CASE NO. 14-40806-cec**

**NOTICE OF MOTION  
TO REOPEN CLOSED CASE**

**PLEASE TAKE NOTICE**, that upon the annexed application of ROBERT J. MUSSO (“Trustee”), former Chapter 7 trustee of the estate of Ladder 3 Corp (“Debtor”), the undersigned will move this Court before the Honorable Carla E. Craig, on the 8<sup>th</sup> day of September, 2015 at 11:00 A.M., at the United States Bankruptcy Court, 271 Cadman Plaza East, Courtroom 3529, Brooklyn, New York, for an order pursuant to 11 U.S.C. §350(b) reopening the Debtor’s closed case to administer assets; withdraw the Trustee’s Report of No Distribution and, waiving the fees for reopening the case, and any further and different relief as this Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE**, that responsive papers, if any, must be in writing, must conform to the requirements of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Rules of the United States Bankruptcy Court for the Eastern District of New York and must be filed on or before August 1, 2015 with the Clerk of the Bankruptcy Court (with a copy to Chambers), and served so as to be received by Rosenberg, Musso & Weiner, LLP, 26 Court Street, Suite 2211, Brooklyn, New York 11242, Attention: Robert J. Musso, Esq., on or before August 27, 2015 at 4:00 p.m. Parties with legal representation shall file with the court: (a) (i) through the Bankruptcy Court’s electronic filing system (in accordance with General Order M-182) which may be accessed through the internet at <https://ecf.nyeb.uscourts.gov> and (ii) in portable document format (PDF) using Adobe Exchange software for conversion, or (b) if a party is unable to file electronically, such party shall submit the response or objection in PDF format on a diskette in an envelope with the case name, case number and title of document: or (c) if a party is unable to file electronically or use PDF format, such party shall submit the

response or objection on a diskette in either Word, Word Perfect, or DOS text (ASCII) format.

**Dated: Brooklyn, New York**  
**August 6, 2015**

  
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**/s/ ROBERT J. MUSSO (RJM-9530)**  
**Office and P.O. Address**  
**26 Court Street (Suite 2211)**  
**Brooklyn, New York 11242**  
**Tel. No. (718) 855-6840**

TO: ALL CREDITORS and PARTIES OF INTEREST.

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

In re:

Ladder 3 Corp,

Debtor.

CHAPTER 7

CASE NO. 14-40806-cec

**APPLICATION IN SUPPORT  
OF NOTICE OF MOTION  
TO REOPEN CLOSED CASE**

**TO: THE HONORABLE CARLA E. CRAIG  
CHIEF U.S. Bankruptcy Judge.**

The application of ROBERT J. MUSSO, respectfully represents as follows:

1. On February 26, 2014 ("Filing Date"), Ladder 3 Corp ("Debtor") filed a Petition under Chapter 7 of the Bankruptcy Code.
2. The Office of the U.S. Trustee appointed Robert J. Musso, Interim Trustee of the above captioned estate who subsequently qualified as permanent Trustee.
3. The Debtor was examined at the meeting of creditors. The Trustee filed his report of no distribution on June 4, 2014. The case was closed on June 5, 2014.
4. The Trustee was recently contacted by Robert M. Fox, the attorney who filed the case on behalf of the Debtor.
5. Debtor's counsel advised the Trustee that he has learned of new assets of the Debtor. Evidently, the Debtor had previously obtained a judgment against a company of approximately \$250,000.00.
6. The Trustee has spoken to the attorney who obtained the judgment on behalf of the Debtor. The attorney now believes the judgment can be collected.
7. The Trustee is serving this motion on all creditors, parties filing a notice of appearance, and any other parties in interest.
8. The Trustee files this motion to reopen the case to allow for the administration of the newly discovered asset; arrange for the Clerk of the Court to fix a bar date to file proof of claims and give notice to creditors of the bar date.

9. The Trustee also requests that his report of no distribution be withdrawn.

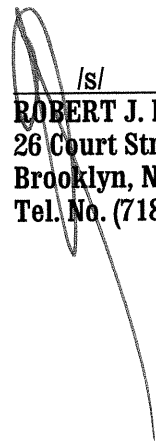
10. The Trustee is serving this motion on the Debtor, all creditors and any other parties in interest.

11. This court has discretion to open this closed case. Creditors should be given an opportunity to file proofs of claim and share in any distribution by the estate.

12. A proposed order is attached as Exhibit "A".

***WHEREFORE***, it is respectfully requested that the Court re-open this case to allow for the administration of the newly discovered estate asset and the withdrawal of the trustee's no distribution report and for any further relief as this Court may deem just and proper.

Dated: Brooklyn, New York  
August 6, 2015

  
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/s/  
**ROBERT J. MUSSO , Trustee**  
26 Court Street, Suite 2211  
Brooklyn, New York 11242  
Tel. No. (718) 855-6840